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August 10, 2007

## **VIA ECF**

Hon. William H. Pauley III United States District Court Southern District of New York 500 Pearl Street, Room 2210 New York, New York 10007

Re: Stamm v. City, et al.

07 CV 16521 (WHP)(RLE)

Dear Judge Pauley:

This office represents the City of New York and New York City Police Department in the above-captioned action, in which plaintiff alleges various violations of her rights when she was ordered to leave the subway system on April 20, 2006. I write respectfully to request that that defendants' time to respond to the Complaint be extended to September 7, 2007.

The original date for defendants' response was August 8, 2007. We regret and ask the Court to excuse the untimeliness of this request. This is the first such request, which is not believed to prejudice plaintiff. The requested extension will allow this office sufficient time to identify and locate the police officers who allegedly engaged in the conduct underlying plaintiff's claims, to investigate the factual allegations contained in plaintiff's complaint, to review the applicable law under which plaintiff's claims are brought, and to formulate an appropriate response. I have spoken with plaintiff's counsel, who consents to this request.

Thank you for your consideration of the foregoing

Respectfully submitted,

effrey S. Dantøwitz

Assistant Corporation Counsel

cc: Bruce J. Turkle

(via ECF and email)